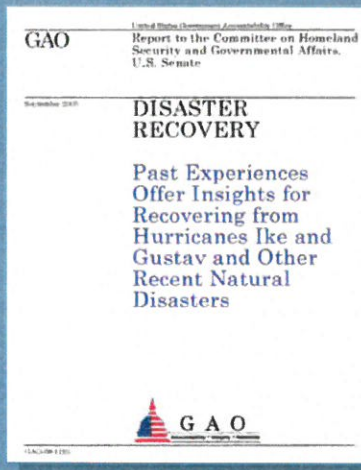


Compliance is at the core of our Firm, and our proven processes have been cited by HUD for both its efficiency and overall excellence. On three separate occasions, the GAO has referred to our system as best practice. The quality of our compliance work is the backbone of how we will protect West Virginia.



"After the 2005 Gulf Coast hurricanes, FEMA and Mississippi state officials used federal funding to obtain an on-line accounting system that tracked and facilitated the sharing of operational documents, thereby reducing the burden on applicants of meeting Public Assistance Grant Program requirements. According to state and local officials, the state contracted with an accounting firm that worked hand-in-hand with applicants to regularly scan and transmit documentation on architectural and engineering estimates, contractor receipts, and related materials from this Web-based system. As a result, FEMA and the state had immediate access to key documents that helped them to make project approval decisions. Further, local officials reported that this information-sharing tool, along with contractor staff from an accounting firm, helped to relieve the documentation and resulting human capital burdens that state and local applicants of the Public Assistance Grant Program faced during project development.

(GAO-08-1120, page 19)

We will have both on-site and remote desktop review capability to ensure fiscal responsibility through appropriate and accurate applicant eligibility and verification of benefits determinations, cost reasonableness, and proper categorization of expenses into Project, Project Delivery, and Administration for roll-up into DRGR reporting for the State. This includes outcome and expenditure monitoring in accordance with the State's benchmarks submitted to HUD, as well as compliance with the federal thresholds contained in CFR 200, Section 3, Fair Housing and other requirements. Any designated WVDO stakeholder will be able to access project-by-project progress detail and payment statuses in real time, as well as the findings of our internal reviews. Should we identify a compliance area in need of strengthening, we will report the item in a timely fashion to WVDO along with our process remedy for resolving it. This is part of our commitment to transparency with WVDO in service of the program's mission and goals.

With a proven track record when it comes to document management, HORNE is comprised of specialists that, from deep subject matter experience, know the compliance environment best. As a result of this expertise, HORNE's document management and compliance system has been recognized as a "best practice" by the Government Accountability Office (GAO). We believe that, for applicants, maintaining the documentation required to stay HUD and state compliant shouldn't be a daunting task, but a streamlined one. We are ready and waiting to deploy a team of professionals to manage intake applicant documentation, whether at the State's service locations, the applicant's residence, or a file storage facility. Our dedicated IT team offers the service of coordinating and executing FRP data transfers to facilitate secure data across software solutions to meet program requirements.



**HORNE**

**SPILMAN THOMAS & BATTLE**  
ATTORNEYS AT LAW

**Dewberry**

**smithcochranhicks**  
CERTIFIED PUBLIC ACCOUNTANTS

**NEEL-SCHAFFER**  
ATTORNEYS AT LAW

The HORNE team works in coordination with our client to assist with document retention and destruction in accordance with the state's document retention policy, as well as compliance with HUD regulations and standards. We will continue to routinely train state personnel for day-to-day access and use of the documentation system and for system management as program administration activities transition. This type of service is duplicated with our jurisdictional clients across the United States and we stand ready to provide the same level of service to West Virginia.

### **13) Program Development and Support**

#### ***a) Monitor performance of each grant using the reporting and performance benchmarks that are established.***

Timely, accurate, and transparent delivery of information is the key to meaningful monitoring and reporting. HORNE employs a customized approach to performance monitoring that includes an up-front risk analysis and ranking of high-risk subrecipients along the lines of key performance benchmarks such as project:

- Scope and timeline management
- Cost reasonableness and budget management
- Quality management
- Safety and human resource management
- Communication practices
- Risk management
- Procurement management
- Reporting compliance

Our reporting approach provides relevant, real-time information to all stakeholders for accountability, effective problem solving, and adequate forecasting. Our workflow management tool is controlled, standardized, and efficient. It provides real-time reporting on key process points, tracking actual performance against goals and identifying bottlenecks in the applicant flow.

HORNE has refined application status reporting on many levels ranging from personnel management to top-level monitoring. We utilize Microsoft SQL Reporting Services to use production data to construct aging, calculation, and prediction model reports that are displayed through a web interface or made available through email subscription services.

HORNE has implemented a system for reporting and tracking the key performance indicators. We provide analysis of key performance measures and offer insights to the CDBG-DR team on issues and performance concerns.

For example, we have incorporated closeout projections at the project-level which allows for tracking and analysis of the individual projects as well as identifying overall coordination needs as the team prepares for closeout of each grant. We also utilize aging reports to identify bottlenecks in the process so that we can address any issues noted to keep projects moving in the right direction.

Other key performance metrics regularly monitored include construction and closeout timelines, beneficiary demographics, median income data, unit output in relation to funds spent for housing programs, and reserve funds.



HORNE continues to track and perform quality assurance reviews at each level to ensure conformance with state and federal reporting metrics. We will continue to provide clear and regular communication to all involved parties and continually seek collaborative solutions for the varying needs of the programs.

#### ***14) Policy Development and Review***

##### ***a) Develop and monitor required policies and procedures for each grant as needed.***

HORNE is a leader in navigating disaster recovery regulations and compliance, particularly the Stafford Act and 2 CFR 200. We educate both staff and our clients on applicable laws and regulations and how they are to be applied in real world recovery situations.

HORNE takes a collaborative approach to policy development. We provide expert advice to our clients that directly ties to their goals and objectives. Our policy development will begin with a full review of WVDO's existing resources including policies, procedures, guidebooks and training. HORNE will then turn our observations into a comprehensive report to assess for gaps in requirements, the opportunity for clarity, advice on efficiencies to be gained, and are of high-risk for adequate monitoring throughout the life of the program. This report will be brought to WVDO decision makers for collaborative discussion on a plan of action to bring policies and procedures up to date. Because we know programs evolve and change on a regular basis, HORNE will conduct a review of policies and procedures on a minimum annual schedule as well as ad hoc at critical development milestones in the program lifecycle.

The HORNE team consists of readily deployable professionals with extensive experience in CDBG disaster recovery policy and procedure. Our government services unit has served in multiple capacities on multi-million and multi-billion dollar federal contracts throughout the United States. We focus on continual improvement of our knowledge leadership and have learned valuable lessons on process and program design by working side-by-side with our governmental counterparts on their recovery contracts. We bring those years of experience to you and look forward to helping you meet and exceed your goals on service delivery.

The HORNE team has considerable experience developing and refining policy and procedure documents for CDBG-DR programs and we start the process by defining a complete, fully documented and eligible file. From that starting point, we work backwards to develop policies and procedures that best achieve a successful end product with efficiency and minimal complexity. By understanding what complete looks like, we are able to avoid building a bureaucracy and focus on simplifying the process for our applicants. The HORNE team will incorporate approved policies and procedures into our training guides and marketing material.

#### ***15) Support of Program and Financial Compliance Requirements***

##### ***a) Assist the Agency in support of program and financial compliance requirements. Identify applicable compliance requirements, and as requested, areas and processes.***

HORNE has the readily available capacity to develop a controlled process to manage the West Virginia program award dollars and leveraged funding. Our process simplifies complex accounting by ensuring transactions are authorized, supported, and compliant with program requirements and all applicable regulations.

OUR COMPLIANCE  
PROCESS HAS  
BEEN CITED BY  
HUD FOR BOTH  
ITS EFFICIENCY  
AND OVERALL  
EXCELLENCE. ON  
THREE SEPARATE  
OCCASIONS, THE  
GAO HAS REFERRED  
TO OUR SYSTEM AS  
“BEST PRACTICE”.

Disaster recovery compliance is a specialty within a specialty. HORNE's strength lies in having a longstanding and constructive relationship with HUD officials and a deep understanding of specific CDBG-DR compliance issues. Our compliance approach relies on our extensive technical expertise and years of developing and testing recovery best practices in large-scale CDBG-DR projects in Mississippi, New Jersey, New York, and Texas.

Our practices derive from the practical application of the latest CFRs, HUD notices, and state and federal law. We subscribe to OneCPD, FEMA, and HUD newsfeeds for updates and additional guidance to CDBG-DR regulations and maintain high-level relationships at HUD through former technical experts. Our compliance process has been cited by HUD for both its efficiency and overall excellence. On three separate occasions, the GAO has referred to our system as “best practice”.

In coordination with our clients, we develop policies and procedures to reflect the applicable regulations and mitigate material risks. To ensure transparency and accountability, we establish appropriate reporting requirements and timelines for critical data submissions such as Section 3, DRGR, QPR, and program status reporting.

Data collected feeds our reporting requirements and provides real-time insight into the program's status. As a result, we enhance program compliance through unprecedented program transparency and the accountability that protects our client from unwanted and costly funding recapture.

If new Federal Registers or HUD Notices mandate additional procedures for CDBG-DR compliance, we will document the changes required, update our processes and workflow, retrain staff, and monitor the change to evaluate its impact.

Our compliance approach methodically ensures that we consider all applicable regulations while relying on years of experience to expedite process development and ultimately improve program delivery. Our people are experts at implementing CDBG-DR programs and HORNE's compliance approach is best documented by the tens of thousands of applications we have processed and the affirmative reports from HUD and GAO.

The quality of our compliance work is the backbone of how we protect the integrity of CDBG-DR programs and our clients over the long term. Our goal is not simply to complete a checklist to show compliance, but to effectively show that all requirements have been met and provide supplemental resources available to aid in the recovery of the individual and community.

#### 16) Communications

- a) *Provide accurate, timely information to appropriate individuals, departments and agencies.*

HORNE operates under a “no surprises” philosophy. We ensure prompt communication of any issues that are important for our clients, regardless of where those issues fall on a reporting timeline. It is our mission to be proactive in identifying solutions and to keep the production pipeline and performance benchmarks in sight at all times.

Our team will provide Executive Briefings to the State regularly as desired by the State. These briefings will outline current work to date, any changes or updates to HUD requirements, project work underway,



and work planned in the near and far term. In addition, our team is heavily committed to full transparency and will provide real-time visibility into the program status via system tools such as interactive dashboard reporting, on-demand reporting, and GIS-enhanced tools which map locations and status of work throughout the project pipeline. The State will have full access to our live production reports, applicant work flow tool, and applicant communication logs.

#### *17) Internal Communication*

##### *a) Monitor certain key indicators at the request of the Agency:*

- i. Status by grant, including monitoring of the budget, schedule and performance metrics*
- ii. Issues impacting each grant, including reported problems, lagging performance, communication issues, etc., and the actions being taken to resolve them*
- iii. Identification of risks associated with each grant and the actions being taken to mitigate, avoid or reduce them*
- iv. Deliverables completed to date and those scheduled for completion*
- v. Resources available to deliver services, including staff and structure, technology and budget; identify constraints affecting delivery and institute corrective action*

##### *b) Informal communication with the agency will be frequent and will also include telephone calls and emails.*

**HORNE  
UNDERSTANDS  
THAT REGULAR  
COMMUNICATION  
STRENGTHENS  
CLIENT  
RELATIONSHIPS AND  
GUIDES PROJECTS  
TO SUCCESSFUL  
OUTCOMES.**

HORNE understands that regular communication strengthens client relationships and guides projects to successful outcomes. Clear communication between WVDO management and the project teams is critical to identifying barriers early and keeping projects headed in the right direction. We will participate in regular status update meetings with WVDO leadership to keep them informed of the progress of each program and work with them to resolve any potential barriers. We will also provide automated, real-time reports which are sent via the auto-generated email process. We believe this gives the decision-makers current information to evaluate the progress of each project on a more frequent basis.

Your HORNE Team will communicate daily with WVDO staff through phone calls, emails, and informal meetings. This is necessary to keep our fingers on the pulse of the various grants in order to identify and address issues early. Our proactive approach to communication helps to ensure that projects stay on track and WVDO is informed of any information potentially affecting projects in a timely manner. Items that will be communicated regularly include:

- Grant status, including monitoring of the budget, schedule and performance metrics;
- Potential issues affecting each grant, including reported problems, lagging performance, communication issues, etc., and the actions being taken to resolve them;
- Identification of risks associated with each project and the actions being taken to mitigate, avoid, or reduce them;
- Compliance concerns or observations;
- Deliverables completed to date and those scheduled for completion; and
- Resources available to deliver services, including staff, technology, and budget, as well as any restraints affecting delivery and proposed corrective action.

HORNE is committed to keeping WVDO informed of all relevant information related to each grant. One of the key elements to the success of this disaster recovery effort will be the open and clear communication between WVDO and HORNE. We will work closely with WVDO staff to make sure our communication methods are effective and we are meeting expectations.

**18) External Communication**

- a) Provide information for the Agency to utilize in external communication to subrecipients as well as other pertinent parties. Provide the Agency with current status reports on a regular basis.*
- b) Assist the Agency in support of external communications to include design and publish packets, reports and presentations for legislative and congressional constituents. Assist in planning, publicizing and delivering news releases and conferences and provide web content for the Agency website.*

Keeping the general public informed of the status of the programs and any news related to the programs is a critical piece to the puzzle. In order to maintain transparency, we have worked with web developers to present data related to each program in a clear, effective way on the division's website. We will provide this same service to WVDO.

We will assist WVDO in written and verbal communication with HUD officials based on the experience we've gained working with the agency for over ten years. We have seen HUD policies and standards evolve with every new disaster allocation. Likewise, we have extensive experience working with the state auditor's office on our clients' behalf to answer questions they have regarding programs, train them on the program software to facilitate any fraud investigations and provide any necessary documentation requested upon approval of the awarding agency.

HORNE also has a long history of negotiating with fair housing advocacy groups on a local and national level. We also work alongside advocacy groups during outreach efforts making presentations to community groups regarding program guidelines and eligibility criteria, both in English and Spanish. Having worked on many HUD-funded programs, HORNE understands the importance of providing open and clear communication regarding the programs, their opportunities, and their progress.

We speak HUD's language fluently. As experienced CDBG-DR project administrators, HORNE has built great relationships with HUD, communicating with them on all aspects of funded programs, as well as participating in and responding to HUD audits. Our years of experience and knowledge of HUD regulations allows us to work quickly to address any programmatic inquiries/questions from HUD and supporting our responses through documentation. All assessments and reports will be maintained within the system and will be readily available upon request.

We have extensive experience in CDBG regulatory interpretation, including understanding and maintaining expert-level knowledge of modifications or waivers as provided under applicable Federal Registers. We have provided guidance to states on the types and language of waiver requests that should be submitted to HUD to ensure the CDBG appropriation adequately meets the unique needs of the impacted community.

In accordance with WVDO policies and procedures, HORNE will assist in the preparation of materials the Program is required to present in highly public forums. We will prepare informational memos, analytical and status reports, procurement packages for approval, minor and substantial action plan amendments. We have the ability to generate status reports for each program at a detailed level to provide data-driven discussions in meetings and other discussion opportunities. The status reports can provide the program activity and performance information needed to make strategic decisions regarding each project such as:



- Project status,
- Budget vs. actual comparisons by project,
- Potential funding de-obligations,
- Construction and Closeout timelines,
- Compliance status, and
- Risk analysis.

**19) Support of Monitoring Plans and Execution**

- Ensure that all stakeholders, including the program manager, are aware of and compliant with any regulatory requirements associated with CDBG and CDBG- DR funds. Monitor the action and communication plans associated with each grant to ensure that all key performance indicators are being properly monitored and that issues are addressed quickly and resolved effectively.*
- Work with Agency Compliance Unit to ensure proper monitoring of subrecipients administratively, programmatically and financially for CDBG and CDBG-DR grants.*
- Ensure timely submission of required reporting including financial reports, performance reports, resolution of findings, resolution of recommended changes, implementation of policies and resolution of issues affecting performance.*
- As requested by the Agency, conduct desk reviews of the documentation supporting the program reports for accuracy and compliance. Develop compliance checklist and other tools for Compliance Unit and program managers to assist with the compliance and oversight required by the programs.*
- Ensure proper documentation at all levels, both at the Agency level and subrecipient level, for proper dissemination of information as well as proper record keeping.*

A variety of methods can be used to oversee compliance and performance. HORNE will work with the experts who comprise WVDO's Compliance Department to design the most effective method for the project being monitored. Our team understands that the most important aspect of successful monitoring is to be informed and to communicate effectively. Accordingly, we address in detail monitoring and reporting in the proposed communication plan included herein.

As Program Manager, HORNE will serve in the capacity of internal auditor to ensure that all stakeholders, including the program managers, are aware of and compliant with any regulatory requirements associated with the CDBG-DR funds. Additionally, we will monitor the action and communication plans associated with each grant to ensure that all key performance indicators are being properly monitored and issues are addressed and resolved quickly and effectively.

HORNE will have both on-site and remote desktop review capability. Monitoring activities and reporting will occur on no less than a monthly basis to ensure compliance and fiscal responsibility through the appropriate use of monitoring standards according to the plan set forth by WVDO. At the fundamental level, we will assess for cost reasonableness standards and proper categorization of expenses into Project, Project Delivery, and Administration for roll-up into HUD reporting.

HORNE will monitor and evaluate subrecipient performance for adherence to monthly, quarterly, and annual goals. We will address performance issues, as needed, through administrative measures and additional training and outreach. Reporting templates and memos will be designed in collaboration with WVDO to ensure customization and will be centered around a financial management perspective to include:

- Financial reporting,
- Accounting records,
- Internal control procedures,
- Budget control procedures,
- Allowable costs, and
- Source documentation.

Progress reports will be designed for each individual grant to provide monitoring on the key benchmarks that have been established for performance.

Upon review of the reports, HORNE will then conduct any necessary site visits and limited scope audits for documentation, eligibility, labor standards, and fair housing compliance. Program progress will also be monitored through interviews and continuous correspondence with program managers, contractors, and other stakeholders.

Should it be determined that reporting has fallen behind schedule or performance issues are identified, HORNE can assist WVDO in increasing the monitoring of the grant. Such increased efforts would include detailed training of staff on specific issues, frequent site visits including a review of project records and compliance documentation, and additional team meetings for adequate follow-up. If requested by WVDO, HORNE can conduct desk reviews of the documentation supporting the program reports for accuracy and compliance. We will be available to help develop compliance checklists for program managers to assist with their compliance with program requirements.

Diligence will begin with the training of subrecipient/contractors to ensure they fully understand the requirements and regulations. Because the key to a successful program is a well-educated team, training will continue throughout the program. Our systems are set up to track all projects from beginning to end and can provide real-time reports and status updates relating to the funded activities. As previously mentioned, we will communicate any identified issues and risks to WVDO during the regular briefings.

## ***20) Support of Program Operations, as required***

- a) Provide any operational support as requested by the Agency, including full project management, policy development or other support and consulting roles. Provide resources to quickly and effectively provide operational and managerial services at all levels of the programs to the Agency.***

HORNE's depth of knowledge with each of HUD programs will allow us to quickly step in and provide any needed support for the program staff. As experienced project administrators, every aspect of our role is focused on compliance and meeting performance objectives. Our experience allows us to define and maintain all the necessary information required to track, evaluate, and report on critical performance indicators. In addition, we utilize many additional resources to track, verify and ensure compliance and program success.

For example, we have developed tools that monitor the entire funding and reimbursement process and ensure that funding flows consistent with contractual and budgeted intent. We use these tools to analyze program operations and measure performance objectives to ensure that these objectives are met and remain on schedule. Our alliance with our subcontractors brings strength, resources, and immense experience in HUD programs, which will allow us to respond to a wide range of needs and provide innovative solutions to complex situations.



## 21) Program Management Team Support

- a) As requested by the Agency, provide additional resources to any Compliance Unit or program team member or program grant to appropriately and timely respond to program management needs.*

The complexity of these programs requires concurrent direction, facilitation, and implementation. Project performance benchmarks and updated budget comparisons will be established to measure progress and compliance with emphasis on critical objectives. Pivotal stages will be identified and a monitoring checkpoint established to ensure follow-up. HORNE's communication plan with the WVDO Compliance Unit and program team will be in line with the program's objectives and will include a formal structure for regular reporting, performance milestones, project-wide meetings, and policies on information for the community and press.

The centerpiece to the oversight of overall program activities is the use of performance and productivity benchmarks for every major activity in each program. These will be consistently monitored and timely reported to the Compliance Unit, program team members and other appropriate stakeholders as identified. This establishes accountability for deliverables that is so often deemphasized to the detriment of large projects. Budgetary monitoring is also critical for compliance and effective use of funds and will be included in our reviews and reports. This extensive monitoring is an integral part of the overall communication plan that we will establish to ensure that every team member and constituent is informed and aware of pertinent issues and status of the program.

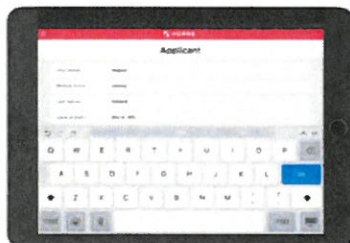
HORNE has proven the ability to quickly provide a wide array of resources to meet program management needs. In Mississippi, we recently assumed responsibility for MDA's 2008 disaster grants with a seamless transition. These services were not originally anticipated. MDA leadership enlisted HORNE to assist in preparation for a HUD monitoring visit. Our ability to rapidly respond to this need ultimately persuaded MDA to engage us for full grant administration services over these programs. Our capacity and experience along with that of our subcontractors gives us the ability to respond to any program management or operational need.

## 22) IT Oversight and System Development

- a) Perform comprehensive monitoring of all existing systems, connections and automated processes currently deployed amongst the grant programs. Provide IT developers to respond timely to development needs of the existing systems as well as any systems previously implemented. Work with Agency database developer to help implement an efficient and effective database, and make improvements to current data tracking processes.*

HORNE has worked with a number of grant management software solutions in our service to grantees across seven states. Our team of IT experts offers agile support through a high aptitude in systems solutions coupled with working knowledge of HUD award programs. This deep knowledge allows our team to identify wrap-around solutions that offer enhanced performance with existing databases/systems. Upon notice of award, HORNE will launch a full IT effort to assess existing systems and address business needs for project operations. Where appropriate, HORNE will present WVDO with options to innovate and potentially streamline software for the program System of Record.

A key to HORNE's successes in disaster recovery program administration has been our ability to quickly stand up an IT solution that both supports project team processes and provides actionable data for program management and financial reporting. Our technology team's unique blend of Project Managers, Business Process Analysts, and Systems Developers deliver a robust, tailored solution using proven methodologies. Our staff includes Hyland Software's OnBase® Certified Engineers, Microsoft Certified Application Developers, VM Certified Professionals, Certified Business Analysis Professionals (CBAP), and Project Management Professionals (PMP).



HORNE offers state-of-the-art mobile and web-based intake interfaces for the applicant that are designed to eliminate error. The system automates large portions of the eligibility process with features that clearly outline application requirements, are easy to use, and are accompanied by policies and procedures for case management. These tools are designed to keep it simple.

### 23) Training/Outreach Support

- a) Train and develop Agency Compliance Unit and program team members to meet performance objectives and ensure adherence to all applicable regulations and requirements. When major changes in program policy or requirements occur, prepare the necessary training materials and program to effectively communicate the changes.*

HORNE provides initial and ongoing training to all employees, subcontractors, and state government employees on applicable state and program policies. We will institute a testing program which ensures all attendees have an extensive understanding of the policy and can demonstrate understanding through online assessments.

In addition to HORNE's commitment to ensuring excellence with all of the specifications detailed herein, we recognize the need for broad outreach, education, and training relative to all program and regulatory requirements. We know that proper training is critical in order to meet performance objectives and ensure compliance. It's possible that initial reviews of grants and programs could uncover areas that require new or additional training sessions to improve effectiveness and communication. HORNE is highly qualified to provide specific training related to these grants and programs. Our training department has the expertise and capacity to provide additional training and outreach support as requested.

HORNE will engage in ongoing outreach and training efforts throughout the year as needed including:

- Presentations to all program stakeholders including WVDO program team members, subrecipients, contractors, program administrators, and public audiences;
- Train and develop team members to meet performance objectives and ensure compliance;
- Development and distribution of informational and educational materials;
- Regularly scheduled classes on various components of the program requirements;
- Media presentations;
- Availability of informational and critical documentation on WVDO's public website;
- Community outreach events such as business workshops or job fairs to identify potential partners;



- Provide appropriate outreach signage at project sites and in project communities to convey opportunities;
- Partner with local community groups and civic groups to ensure wide distribution of outreach materials;

As mentioned earlier, an example of our ability to provide training support involved MDA's increased training offered in 2014 regarding Section 3 compliance. In partnership with MDA, we developed the training materials, coordinated the training sessions, participated as key speakers and implemented a document retention system so MDA could retain records of all training sessions. Approximately 15-20 successful training sessions were held for various audiences regarding Section 3 compliance during 2014. We believe the ability to implement program policy changes as well as modifications to program requirements is a critical component of a successful PMO.

#### 24) Change Control

- a) Maintain and monitor the established change management process that contributes to the achievement of a project's objectives. Assist the agency in implementing change effectively to maximize staff and project capability. Modify the process, as needed, communicating and documenting the process. Ensure that any changes are properly researched and evaluated.*

HORNE understands the importance of establishing and monitoring a change management process that contributes to the achievement of the program's objectives. We have proven this time and again by implementing strong change control processes on our projects such as the Small Rental Assistance Program in Mississippi, where there were initially three contractors each handling different parts of the process, making it challenging to keep each team informed as to change requests in the review and final decisions. Working with MDA, HORNE quickly developed a change control process within our program database to track the changes submitted, who submitted them, how long they had been outstanding and other pertinent information. Notifications were sent to each stakeholder through one click of a button.

As these programs are nearing their end, policy and procedure changes are not nearly as frequent but are no less important. HORNE will monitor and track changes made to each program so that the files tell the whole story. Compliance consequences from any recommended changes will be reviewed by our HUD technical team before submittal to WVDO for approval.

#### 25) Environmental Review Process

- a) Ensure that each program being funded complied with 24 CFR Part 58, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities (see specifically 24 CFR 58.18). In addition to outlining required procedures for assessing the environmental viability of the proposed action, Part 58 specifies procedures that must be followed in releasing HUD funds to project sponsors (see Subpart H of Part 58). Part 58 also requires that the actions of project sponsors during project implementation are monitored and the environmental requirements on which the grant of HUD funds is conditioned (24 CFR 58.18(a)(1) is enforced.*
- b) Prepare general guidance for project sponsors that (1) list the basic elements of an environmental assessment, (2) address common misconceptions about the environmental review process, and (3) list sources of critical information.*

- c) *Evaluation of each environmental review package will include the following basic steps:*
- i. *Initial review of the package to assess its completeness and to identify significant environmental issues*
  - ii. *Preparation of initial written comments on components of the environmental review that must be added or strengthened*
  - iii. *Inspection of the proposed site and its surroundings to check the accuracy of the environmental review*
  - iv. *Preparation of additional written comments on any inaccuracies identified during the site inspections*
  - v. *Review of the environmental review package as revised by the project sponsor*
  - vi. *Preparation of suggested "conditions of approval" to be added to the final environmental assessment prior to approval by the Agency to ensure all information shared during review process*
  - vii. *Performance of lead-based paint identification, remediation, and inspection activities as needed for covered structures*

If necessary and at the request of WVDO, HORNE is able to identify any construction constraints that exist for each property, such as Lead-Based Paint, Section 106 restraints, or conditions of construction due to location within a floodplain. We will perform environmental and National Historic Preservation Act (NHPA) reviews in accordance with the review topics and related authority listed in the following Table.

ENVIRONMENTAL REVIEW TOPIC SUMMARY	
REVIEW TOPIC	STATUTES, EXECUTIVE ORDERS, AND REGULATIONS
Historic Preservation (Architectural History and Archaeology)	National Historic Preservation Act, 36 CFR Part 800, Executive Order 11593
Floodplain Management	24 CFR 55, Executive Order 11988
Wetland Protection	Clean Water Act, 33 CFR Parts 320-330, and Executive Order 11990
Coastal Zone Management	Coastal Zone Management Act, Sections 307(c), (d)
Sole Source Aquifers	Safe Drinking Water Act, and EPA regulations at 40 CFR 149
Endangered Species	Endangered Species Act, 50 CFR 402
Farmlands Protection	Farmland Protection Policy Act, and Department of Agriculture regulations at 40 CFR 658
Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature	24 CFR 51C
Hazardous, Toxic or Radioactive Materials & Substances	24 CFR 58.5(i)(2)(i) and (iii)
Siting of HUD-Assisted Projects in Runway Clear Zones at Civil Airports and Clear Zones and Accident Potential Zones at Military Airfields	24 CFR 51D
Lead Safe Housing Rule	24 CFR 35 Subpart H



There are 14 potential tasks associated with these environmental evaluations as described in further detail below. Not every application will require every task be performed. The requirement for the performance of various tasks depends on the site location, the age of the structure, construction intent (rehabilitation, reconstruction, new construction), and potential environmental concerns identified as part of the desktop Step 1 evaluation listed below under Task 4.

CONCURRENT TASKS	MANAGEMENT SUPPORT		
	TASK 1: PROGRAMMATIC SUPPORT / PROJECT MANAGEMENT		
	APPLICATION, DATA & GIS		
	TASK 2: GEOGRAPHIC INFORMATION SYSTEM (GIS) / DATABASE	TASK 3: DATA COLLECTION, DATA VERIFICATION, DATA MANAGEMENT	TASK 4: STEP I APPLICATION PROCESSING
	REVIEW		
	TASK 5: ABOVE-GROUND STORAGE TANK (AST) EVALUATION	TASK 6: MISCELLANEOUS REVIEW TOPICS EVALUATION	TASK 7: ECOLOGICAL REVIEW TOPICS EVALUATION
	SHPO COORDINATION		
	TASK 8: ARCHAEOLOGICAL SURVEY	TASK 9: ARCHITECTURAL HISTORY SURVEY	
	LBP & SECTION 106		
	TASK 10: LEAD-BASED PAINT VISUAL ASSESSMENT	TASK 11: XR-F CONFIRMATION FOR FAILED LEAD-BASED PAINT VISUAL ASSESSMENT	
	MITIGATION		
	TASK 12: ARCHITECTURAL HISTORY MITIGATION SUPPORT	TASK 13: LEAD-BASED PAINT MITIGATION SUPPORT	TASK 14: MITIGATION CLEARANCE

#### **TASK 1: PROGRAMMATIC SUPPORT / PROJECT MANAGEMENT**

The HORNE team will manage environmental and historic preservation reviews as necessary to plan, coordinate, implement, report, and communicate the progress of the full range of management services, including:

- Management of all tasks and deliverables related to the program;
- Quality assurance/quality control for all deliverables;
- Meeting and teleconference attendance as required;
- Responsibility for compliance with health and safety requirements; and
- Submittal of weekly progress reports.

#### **TASK 2: GEOGRAPHIC INFORMATION SYSTEM (GIS) / DATABASE**

The HORNE team will maintain and operate a Geographical Information System (GIS) with ESRI Product Arc Info 9.x. The GIS will assist the Historic Preservation Team (HPT), Environmental Review Team (ERT), Data Collection Team (DCT), Data Verification Team (DVT), Application Processing Team (APT), and Data Management Team (DMT) to process site-specific checklists. This also includes active management of the database and web interface, including Data Transfer Protocol (DTP) to System of Record.

**TASK 3: DATA COLLECTION, DATA VERIFICATION, DATA MANAGEMENT**

The HORNE team will obtain and review property address and application information for the data collection, data verification, and environmental review process.

Field deployment, including:

- a) Data collection team members;
- b) Data verification, including site visits to establish GPS coordinates and limited photo recordation/observation on a field inspector checklist, from a public right-of-way (DVT); and
- c) Data management team will upload data for interface/usage.

**TASK 4: STEP 1 APPLICATION PROCESSING**

The Step 1 review includes the following:

- Following completion of DCT, DVT, DMT, and data incorporation into the secure ArcGIS database, we will assess each eligible applicant site through completion of a Site- Specific Checklist (SSC).
- Field deployments identified through completion of the SSC may include wetlands, threatened and endangered species, ASTs, and potentially contaminated sites based on site observations and readily available regulatory database information.
- Data upload and reporting.
- Regulatory agency coordination, as needed.

**TASK 5: ABOVE-GROUND STORAGE TANK (AST) EVALUATION**

Complete the Above-ground Storage Tank (AST) environmental review for applicable sites (new construction or construction outside the existing footprint, or adding more people). This process will include a one-mile radius review of the application site. This evaluation fulfills the regulation of siting of HUD-assisted projects near hazardous operations handling conventional fuels or chemicals of an explosive or flammable nature (24CFR51C).

**TASK 6: MISCELLANEOUS REVIEW TOPICS EVALUATION**

Complete any necessary Step 2 environmental review and field deployments relating to the SSC for:

- Floodplain Management: 24CFR 55, E.O. 11988;
- Sole Source Aquifers: Safe Drinking Water Act, and EPA regulations at 40CFR149;
- Farmlands Protection: 40CFR658;
- Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional;
- Fuels or Chemicals of an Explosive or Flammable Nature: 24CFR51C;
- Hazardous, Toxic, or Radioactive Materials & Substances: 24CFR58.5(i)(2)(i) and (iii);
- Siting of HUD-Assisted Projects in Runway Clear Zones at Civil Airports and Clear Zones and Accident Potential Zones at Military Airfields: 24CFR51D;
- Data upload and reporting; and
- Regulatory Agency coordination as needed.

**TASK 7: ECOLOGICAL REVIEW TOPICS EVALUATION**

Complete any necessary Step 2 environmental review and field deployments relating to the SSC for:

- Wetland Protection: Clean Water Act, 33CFR Parts 320-330, and E.O. 11990;
- Coastal Zone Management: Coastal Zone Management Act, Sections 307(c), (d);



- Endangered Species: Endangered Species Act, 50CFR402;
- Data upload and reporting; and
- Regulatory Agency coordination as needed.

### **TASK 8: ARCHAEOLOGICAL SURVEY**

The HORNE team will perform an Archaeological Identification Survey to identify archaeological resources that may be eligible for the National Register of Historic Places (NRHP). The focus of surveys is to systematically sample a given property where a planned “project” (or “undertaking” as defined in the Section 106 regulations) is planned to occur to ensure that significant archaeological resources are identified and not affected. Surveys typically entail field survey and testing, laboratory processing and analysis, and reporting.

#### *Archaeological Phase IA*

Phase IA Assessment studies typically include archival and background research, a pedestrian survey of the property, data analysis, and reporting. Phase IA Archaeological Assessments are often conducted to determine the probability of recovering/identifying archaeological resources within a specified Area of Potential Effects (APE).

#### *Archaeological Phase IB*

Based on the data gathered during the Phase IA study indicating that additional archaeological testing is required, a testing strategy will be developed that will help determine the best methods to identify potential archaeological resources. Phase IB methods typically include pedestrian and subsurface shovel testing. Artifacts are collected and taken to a lab for processing and analysis. The methods, results and recommendations are presented in a final report, and submitted by WVDO to the SHPO for review and comment.

### **TASK 9: ARCHITECTURAL HISTORY SURVEY**

The HORNE team will obtain, interpret, and report on information regarding potentially historic properties.

#### *Field Review and Historical Research*

The HORNE team will use the standardized survey form to record information about potentially historic properties. This form includes a physical description of each property, a brief overview of historic source materials consulted, and the results of research. A location map, a map showing the APE for the proposed work and up to six digital color photographs will be appended to each form.

The HORNE team will complete written descriptions of each property and insert digital photographs into the standardized field survey form.

#### *Section 106 Coordination with West Virginia SHPO*

The HORNE team will complete correspondence to the SHPO and transmit this to the review agency for its consideration. Correspondence will reference the following information, which will be included on each field survey form:

- “No Historic Properties Affected” determination (if property is deemed not to be National Register listed or eligible);

- Property is determined National Register-eligible, but project will not have an adverse effect if treatment follows standardized protocol (low-impact construction guidelines, standardized approaches to elevation involving historic properties articulated in FEMA How-To Guide 386-6 “Integrating Historic Property and Cultural Resource Considerations into Hazard Mitigation Planning,” etc.);
- Property is determined National Register-eligible, and project will have adverse effect; and
- Additional consultation required (outside the scope of this effort).

All completed inventory forms will then be assembled, a transmittal letter from WVDO completed, and all materials forwarded to WVDO for signature and transmittal.

#### **TASK 10: LEAD-BASED PAINT VISUAL ASSESSMENT**

The HORNE team will conduct lead-based paint (LBP) visual assessments utilizing qualified lead-based paint inspectors. For each application with a structure, the construction of which was completed prior to January 1, 1978, procedures include:

- Scheduling and deployment of the inspection team;
- Visual assessment of the applicant structure;
- Preparation of assessment reports; and
- If needed, review any prior lead-based paint inspections and clearance assessments.

The work will be performed in conformance with the U.S. Department of Housing and Urban Development (HUD) Lead Safe Housing Rule (24 CFR Part 35 Subpart H 35.720). It is understood that all structures built on or after January 1, 1978, are exempt from the HUD regulations. We will assess the age of the applicants' subject structures based on information obtained. Those found to be constructed after 1978 are exempt and no further work related to LBP will be performed. We will also assess the information provided by an applicant relative to previous LBP surveys and/or removal action and clearance surveys. If the applicant can provide appropriate documentation that the property has been found to be free of lead-based paint by a certified inspector or if the Applicant can provide appropriate documentation that all lead-based paint has been removed from the property, and clearance has been achieved, the applicant's property may be deemed exempt from the subject HUD regulation.

For all non-exempt properties, the HORNE team will assist WVDO with implementing each requirement of the Lead Safe Housing Rule (24 CFR Part 35 Subpart H, 35.720), as follows:

- We will prepare and submit a report documenting the results of the visual assessment to WVDO and/or the applicant within 30 days of the site visit.
- We will review applicant responses to the visual assessment report relating to additional lead-based paint sampling, paint stabilization, and clearance testing.

#### **TASK 11: XR-F CONFIRMATION FOR FAILED LEAD-BASED PAINT VISUAL ASSESSMENT**

Conduct XR-F lead-based paint detection surveys on those properties which fail the initial lead-based paint inspection.



**TASK 12: ARCHITECTURAL HISTORY MITIGATION SUPPORT**

In those cases where SHPO concurs with a finding of “Conditional No Adverse Effect” under Section 106, assist applicants in gaining a “No Adverse Effect” determination, including:

- Notify these applicants to inform them their property has been determined historic.
- Advise applicants of the conditions required to obtain a “No Adverse Effect” determination (necessary for NFIP purposes as well as SHPO approval).
- Inform the applicants of historic properties of this additional local and state historic preservation review requirements, thus providing applicants sufficient time to secure professional assistance to begin the process of developing customized elevation design plans.
- Coordinate with the SHPO's historic architect and other review staff and coordinate tracking materials among state and local review agencies to ensure that all required materials are submitted so that appropriate reviews may be undertaken and concluded.

**TASK 13: LEAD-BASED PAINT MITIGATION SUPPORT**

In those cases where an applicant fails the XR-F confirmation test, the HORNE team will consult with the individual applicant to explain the implications of and the remedy for a failed Lead-Based Paint Inspection. We will be available for reasonable on-site consultation through the remediation process and offer a draft scope of work to the contractor in order to propose services toward the applicant obtaining certification that their property meets the requirements of the Lead Safe Housing Rule (24 CFR Part 35 Subpart H, 35.720).

**TASK 14: MITIGATION CLEARANCE**

In those cases where an applicant fails the XR-F confirmation test and mitigation for LBP are performed by the Construction Contractor, the HORNE team will provide clearance for the mitigation which identifies that the LBP mitigation was performed in accordance with the requirements of the Lead Safe Housing Rule (24CFR35 Subpart H, 35.720).

In accordance with 24 CFR 58.18, the program provides conditions to the award in accordance with the environmental review record for construction activities. As part of the inspection process applied during the rehabilitation activities, we will monitor the environmental conditions to verify and document that those conditions were included in the work. Also, in accordance with 24 CFR 58 Subpart H, we have developed a process for the release of funds for applicants in the program. For applicants covered under the Tiered Environmental Review Record (TERR), we have developed a process for programmatic release of funds already approved by HUD. For those applicants not covered by the TERR, we will prepare a Request for Release of Funds (RROF), provide the publication notices in accordance with Subpart H, and document the approval by HUD for the release of funds. Most of the applicants fall under the TERR which means most of the publication work has been accomplished programmatically and new publications are not required.

**26) Oversight of Subrecipient Contracts**

- a) *Assist the Agency in ensuring that the subrecipients comply with all regulations governing their administrative, financial and programmatic operations; and that the subrecipients achieve their performance objectives on schedule and within budget.*
- b) *Review and ensure compliance with state and federal procurement statutes and regulations specifically with regards to CDBG and CDBG-DR funding.*
- c) *Ensure appropriate permitting for environmental (including lead-based paint and*

*floodplain), drainage, storm water pollution prevention plan, building and other necessary permits has been acquired; plans comply with latest applicable international building code; mitigation elements notes in environmental assessments are included in construction; and the construction bid documents are organized in a manner consistent with all state and federal applicable requirements for bidding and construction. Below is a list of standard services that would be provided during the bid and award phases for each workforce housing project to ensure compliance:*

- i. Document publication of advertisement for construction bid for each project.*
- ii. Attend pre-bid conferences for each project.*
- iii. Work with the design consultant to track bid addenda.*
- iv. Provide oversight and direction for any pre-qualified of contractors/suppliers for alternative delivery approaches for construction.*
- v. Attend bid openings.*
- vi. Review all bid tabulation and evaluation documentation of bid from subrecipient developer and designer.*
- vii. Review and provide recommendation to Agency for award of contract.*

As a highly experienced accounting firm, HORNE understands the importance of clearly defined contracts between working partners. We appreciate that each stakeholder must comprehend their duties and responsibilities fully in order to adequately perform their tasks. Within that concept, our team recognizes that disaster projects and clients' expectations may change during the application process. Because disaster events affect communities in different ways, clients often determine that changes are required to better serve their constituencies' needs. As such, contract revisions and change orders are common occurrences in projects and HORNE is extremely familiar with customizing and maintaining these types of documents.

The project management and design engineering experience of our team include working with both state and local governments in a variety of infrastructure and building construction projects. Members of our team are currently overseeing design and construction management for projects throughout the Mississippi Gulf Coast area, Texas, Colorado and South Carolina that must abide by state and federal mandates following appropriate procurement and construction oversight.

Proper preparation of bid documents and advertisements is crucial to achieving a timely start and completion of the projects to be constructed. HORNE currently provides services to develop and maintain policies and procedures for the procurement of professional services (design, architectural, environmental, legal, etc.) on multiple state programs. Our team understands state and federal procurement statutes and regulations specifically with regards to CDBG-DR funding. We are well versed in the Request for Proposal (RFP) and Request for Quote (RFQ) procedures for compliance with federal HUD and state policies.

Scheduling for the program is mandatory in achieving a successful outcome and completing each program. Time constraints related to the environmental permitting process highlight the need to recapture any lost schedule by expediting construction operations where possible. One major question facing the program will be how to maintain project controls during the bid and construction phase work. For construction, whether providing a day-to-day detailed on-site inspection or a more abbreviated effort that would ensure proper compliance for the expenditure of funding, there are several options that are acceptable industry standards for oversight and compliance. The HORNE team's approach pinpoints the basic requirements for each project and provides additional services to ensure a timely response to the



overall program needs for reporting. It is important that the Program Manager be involved throughout the construction process. Although the Project Manager cannot and would not act in a regulatory capacity, they would assume partial responsibility to ensure all proper permitting for environmental (including wetlands and floodplain), drainage, SWPPP, building and others have been acquired; plans comply with latest IBC; mitigation elements noted in environmental assessments are included in construction; and the construction bid documents are organized in a manner consistent with all state requirements for bidding and construction.

Below is a list of standard services that would be provided during the bid and award phases for each construction project to ensure compliance:

- Document publication of advertisement for construction bid for each project;
- Attend pre-bid conferences for each project;
- Work with the design consultant to track bid addenda;
- Provide oversight and direction for any pre-qualification of contractors/suppliers for alternative delivery approaches for construction;
- Attend bid openings;
- Review all bid tabulates and evaluation of bids from developer and design consultant; and
- Review and approve the recommendation for award of contract.

*27) Ensure a project inspector participates in the bid ready document review process along with required reviews of plans and specifications where applicable, these responsibilities carrying over to the construction phase services. The inspector would collect all appropriate information and record documents to meet the standards set forth by CDBG/CDBG-DR and the Agency at the onset of every project. This includes the review and submittal of recommendations for approval of CDBG and CDBG-DR funding requests if needed.*

*a) Perform the following inspection services during installation of housing:*

- i. Attend pre-construction and project start.*
- ii. Provide assurance that all appropriate bonding and insurance are in place.*
- iii. Review and provide recommendation for approval of monthly CDBG and CDBG-DR requests for funding reimbursements. This would include associated contractors pay requests.*
- iv. Monitor and collect documentation to support Davis-Bacon Act requirements.*
- v. Assist in review and submittal of properly completed and compliant CDBG/CDBG-DR funding requests to the Agency Fiscal Division.*
- vi. Track construction expenditure of CDBG and CDBG-DR funds.*
- vii. Review all construction change orders for compliance.*
- viii. Perform periodic site observations on a routine basis to validate and track work progress.*
- ix. Attend site walk-through for substantial completion and closeout of projects.*
- x. Review project list for closeout operations.*
- xi. Review design consultant record drawings and documents for conformity at closeout.*
- xii. Maintain proper files for all project documents for each assigned projects as per Agency procedures and federal compliance requirements.*

The HORNE team bring a deep bench of experts, along with a track record of success managing construction of improvements. We offer these services to WVDO.

The HORNE team's construction review professionals have experience in construction oversight for numerous Disaster Recovery CDBG programs in Mississippi, Louisiana, South Carolina, and Texas. Many are former builders or managers of large-scale military construction projects. All are very familiar with standard construction practices and proficient in CDBG and program-specific requirements for construction.

Our expertise includes:

- Conducting preconstruction conferences,
- Contractor coordination,
- Schedule management,
- Construction observation and review,
- Project closeout, and
- Project file maintenance.

Our professionals are trained to review construction activities for compliance with CDBG requirements and program-specific policies, conformance to project plans and specifications, and for quality and quantity of work completed.

In advance of starting the bid process, an experienced construction inspector from the HORNE team will be assigned to each project. This project inspector will be an integral part of the bid ready document review process with his/her responsibilities carrying over to the construction phase services. This will ensure project continuity and the ability for the inspector to work directly with the design consultant and developer to affect appropriate revisions and/or responses to project needs in the most prompt manner possible.

Given the wide array of projects underway, it's quite probable that a variety of mixed financing arrangements will be encountered. These might include or employ a combination of tax credit incentives, limited partnerships with equity positions for housing authorities and private investment. Under these scenarios, the equity and/or investment stakeholders typically require that an independent third party is contracted to run the project and perform day-to-day, on-site inspection services as an integral part of the limited partnership agreement/contract, in order to protect their investment.

Where necessary, HORNE will perform regular site inspections, monitor and collect required Davis-Bacon documentation and perform periodic labor force interviews, actively participate in all reviews of contractor monthly pay applications, change orders, and closeout procedures. We will ensure that the type and quality of work has been completed in accordance with the approved construction documents and fully compliant with all federal, state and local statutes, rules and regulations. An inspector will collect all appropriate information and record documents to meet the standards set forth by the respective project. This includes the review and submittal of recommendations for approval of CDBG cash requests.

Our broad experience in CDBG-DR construction includes a complete understanding of the importance of project documentation for funding compliance and the intricacies of stakeholder coordination. This experience and knowledge are valuable assets to WVDO in the successful execution of their CDBG-funded construction activities.

Once construction begins, the HORNE team will have a specialized field review team that will monitor each unit for quality control as the contractor requests payments and will conduct random inspections of the units to ensure continued work and progress is being made in accordance with contract agreements.



28) *Coordinate with the Agency to identify the critical performance benchmarks for each project so progress can be tracked, communicated and assessed at any time. Ensure all project information is available at all times in one comprehensive, user-friendly electronic environment. Financial information will include:*

- a) The overall status of the subrecipients, CDBG or CDBG-DR funds, showing cumulative amounts for funds approved to date; program income received to date; actual disbursements to date; funds on hand at time of request, and requests previously submitted but not disbursed.*
- b) For each activity or budget category, the budgeted amount, the CDBG or CDBG-DR funds drawn to date, the grant funds expended to date, and the current request for payment. Source documentation will be requested to support the expenditures claimed by subrecipients. From this information, determine the subrecipients' rates of spending in their various activity areas or budget categories and whether they are using their program income in a timely fashion and drawing down appropriate amounts of grant funds.*

WE ARE ACTIVELY  
ENGAGED WITH  
THE STATE OF  
MISSISSIPPI ON  
INNOVATIVE  
CLOSEOUT  
SOLUTIONS FOR  
OVER \$5 BILLION  
IN DISASTER  
RECOVERY FUNDING

A centerpiece to the effectiveness of administering any successful program is the creation of performance and/or productivity benchmarks. These must be reported and monitored regularly, which establishes accountability and transparency for deliverables that are too often de-emphasized. The HORNE philosophy is that progress monitoring and reporting should be done regularly and often in order to identify problems early and ensure that targets are met and exceeded.

HORNE is prepared to work with WVDO to maintain reporting on performance benchmarks based on the existing System of Record. Where possible, HORNE will incorporate our audit-tested software solutions to create seamless data management and reporting.

Monitoring financial performance is also critical for compliance and effective use of funds and will be included in our reviews and reports. HORNE will use Microsoft SQL Reporting Services for reporting financial information of each program. We will track any budgetary requests for cash, match funding, and program income for each project so that program managers can easily monitor a project's financial status.

Our team is also highly skilled in HUD-required performance reporting and compliance with HUD Disaster Recovery Grant Reporting (DRGR) system requirements. We serve as the lead on the State of New Jersey's DRGR data management, modifying action plan items and entering their Quarterly Performance Report (QPR) data for the State's \$4.1 billion disaster recovery award. We assist the state with their vouchers and revisions, technical assistance events, and train their teams on DRGR processes to ensure knowledge transfer. Our Certified Fraud Examiners and CPAs also assist New Jersey with reconciliations between the different systems, ensuring compliance, accuracy, and transparency.

Regarding grant closeout, we are actively engaged with the State of Mississippi on innovative closeout solutions for over \$5 billion in disaster recovery funding. Innovation in closeout means that the grant and project activities not only met federal funding requirements but also created a more resilient community over the long-term, including bolstering State agency capacity with systems and business process improvements made during implementation of the grant. We are skilled at working with jurisdictions to leverage disaster recovery funding at every step of the way, including through closeout.

***29) Provide training and user guides to subrecipients as needed for completion of records, and accurate reporting.***

Our work in multiple states with hundreds of subrecipients tells us that at least 10% of subrecipients need targeted, specialized assistance above and beyond standard grant compliance monitoring. This is often due to missing or damaged documentation, staff turnover resulting in missing organizational knowledge, inconsistent cost tracking methodology, or a host of other reasons. HORNE will provide an in-depth assessment of any such subrecipient by using an increased team presence. Such a presence would always be agreed upon through a budget, developed prior to work.

Our experience has proven that program success hinges on subrecipient performance. We approach each engagement by going further than traditional methods to offer established procedures and guidance manuals as well as a strong training component to ensure understanding a minimized error.

We are extremely versed in federally acceptable documentation standards. We will, at WVDO's direction, provide training and technical assistance to subrecipients regarding the forms and types of documentation that will need to be provided alongside payment requests. At the same time, we will work with subrecipients to correct any weaknesses that may exist in their financial tracking system.

We have experienced the most success on past engagements when we have remained the most flexible. Because of this, HORNE is dedicated to maintaining an agile team of professionals who can be brought on to address certain subrecipients as the need is indicated by analysis of the State's needs as well as our risk assessments.

***30) Eligibility Verification***

- a) Ensure that applicants (and tenants) participating in a covered program meet stated eligibility requirements for the respective program. Ensure applicant files are complete and maintained in the Agency document control and management system. Perform reviews of appropriate supporting documentation and perform site visits, as necessary. Ensure applicant are compliant with Stafford Act requirements and Area Median Income (AMI) restrictions.***

Eligibility verification can be a difficult and complex task to perform well. However, HORNE has a long and successful history of developing a comprehensive approach that complies with federal and state regulations. We are prepared to bring this expertise to WVDO. HORNE is home to a team of committed members specifically trained in all phases of the eligibility process and is immediately available to provide superior technical assistance.

As an example of the implementation of our expertise, the HORNE team was engaged to provide technical assistance, design, and oversee compliance with the national objective of a large scale economic development program the national objective of which is to make available to low- and moderate-income (LMI) individuals 51% of the created jobs under this program. Our team worked alongside the State of Mississippi and HUD to develop detailed policy and procedures to document national objective compliance. We developed the record-keeping system to be implemented on the program capturing all required documentation in a streamlined and efficient manner. This system was praised extensively by HUD upon compliance reviews during which it had no compliance findings or concerns.



We implement a flexible, effective outreach and intake process to capture as many potentially eligible applications as possible. Once the application pool has been identified, eligibility turns to the personal consultation phase. HORNE has performed countless in-person meetings with potential applicants. Our analysts are professionally trained to educate the applicant when scheduling their meeting about its purpose, as well as the documentation that they need to bring to this consultation, ensuring that this phase of the process will be time efficient and mutually beneficial to the flow of their application.

Because our foundation is that of a CPA firm, we possess the expertise to perform all methods of determining Area Median Income (AMI) depending upon the requirements of a particular jurisdiction. HORNE has a dedicated AMI review team with extensive experience in calculating and verifying income documentation under each of the HUD-accepted methods.

Historically, resolving the complex Duplication of Benefits issue can be a struggle for some firms. However, our experience has allowed us to offer adaptive solutions to multifaceted problems. HORNE has developed proprietary processes to ensure that benefits are identified and considered appropriate under the Robert T. Stafford Disaster Relief and Emergency Assistance Act.

We have become adept at recognizing the unique ownership challenges that many communities face in its disaster recovery programs. Our team of dedicated specialists understands what is contained in various types of deeds, we know how to thoroughly research the issue of tax, and are fully capable of resolving parcel and land-boundary complexities.

HORNE will perform property assessments to confirm that all federal and State regulations are being met and to offer mitigation solutions when a property is currently out of compliance. Our analysts are well-versed in recognizing the difficulties surrounding many environmental issues and have handled topics such as:

- Special flood hazard areas,
- Lead-based paint,
- Floodway areas,
- Above-ground storage tanks,
- Mold, and
- Hazardous materials.

### ***31) Engineering and Construction Management***

- a) Provide survey, engineering and construction oversight for flood zone determinations, elevation certificates, construction inspections for loan approval and disbursement and inspections for building code compliance and HUD quality standards.***

The HORNE team offers comprehensive engineering and construction management services to help WVDO navigate the eligibility and compliance requirements associated with the construction activities of CDBG-DR programs. Our team has provided engineering and construction management services for the repair, rehabilitation, reconstruction, or new construction for approximately 15,000 residential units in Mississippi and Texas alone.

Engineering services provided for CDBG-DR programs include:

- Boundary surveying,
- Topographic surveying,
- Flood zone determination,
- Floodplain policy development,
- Elevation certificate development,
- Environmental review,
- Geotechnical investigation,
- Structural evaluation,
- Damage assessment,
- Scope of work development, and
- Construction cost estimation.

Accurate and timely execution of these services is critical to meeting program schedules and budgets.

The HORNE team's experience in CDBG-DR construction management equips our team to develop policies, procedures, and controls to effectively accomplish the construction phase of CDBG-DR programs. We have the expertise to execute all phases of construction activity including program setup, procurement, bidding, contracting, contractor pool management, preconstruction conferences, scheduling, cost verification, oversight, and closeout. We are equipped to address critical aspects of CDBG construction including compliance with HUD Housing Quality Standards, Davis-Bacon requirements, building codes, floodplain ordinances, payment request review, and project documentation. Our team of engineers, construction review professionals and schedulers are trained to effectively coordinate with homeowners, local officials, contractors, and other program stakeholders.

At HORNE, we realize the importance of providing quality assessments of disaster-specific damage to structures applying for funding. Our team has extensive experience in providing this service and our documentation of each assessment is comprehensive to support the judgment required by our professionals. We understand that the damage estimate is the basis of the potential award. Our proprietary processes will ensure damage assessments in accordance with program guidelines and standard practices.

Engineering and construction management services play a key role in program execution and compliance. The HORNE team's experience and ability to provide ample resources to manage large scale construction programs can help WVDO meet program milestones and achieve program goals in a timely manner and within budget.

### **32) Property Management Operations**

- a) Implement all program property and tenant policies, including communications and receipt of records from applicants; coordinate on-site inspections to confirm HUD Quality Standards; assist subrecipients with tenant income verification, occupancy and leasing questions; provide support for monitoring and reporting; and manage continued landlord and tenant requirements with program obligations throughout the term of affordability including the resolution of default issues.*

We offer a team experienced in property management. The HORNE team has worked within an array of rental program environments, including single family, multi-family, and mixed income/mixed-use



properties with public housing components across the states of Mississippi, Texas, and New York. Our team has conducted numerous training sessions to ensure the applicants' and/or property managers' understand program operating requirements such as tenant income verification and leasing conditions. We have developed comprehensive training materials that are provided to users and demonstrate step-by-step instructions for all critical property management activities.

Our team is highly experienced with capturing, calculating and tracking income verification to meet HUD's national objective of benefiting low and moderate-income households. We are committed to ensuring program compliance throughout a recipient's affordability period, if applicable under program guidelines.

One example of recurring property management activities that we perform is for MDA on the Small Rental Assistance Program. We perform a 5% compliance review where appropriate records are obtained and a thorough environmental inspection is conducted to ensure compliance with state and federal housing quality standards. We have been successful in helping MDA achieve an extraordinarily low default rate through continuous in-depth monitoring of individual case files and proactive property management.

HORNE has successfully completed numerous HUD program performance monitoring cycles receiving favorable feedback and ultimately zero findings due to the easily-accessible digital library of procedures, property and applicant documentation, and history provided in our document management solution. Our automated reporting capabilities are created to increase accountability by providing a real-time program summary with vital program details to assist with client requests and HUD Disaster Recovery Grant Reports.

### **33) Oversight of Overall Program**

- a) Provide project management for CDBG and disaster recovery programs as needed by the Agency.*
- b) Coordinate the efforts of monitoring compliance over environmental, construction, financial and HUD regulations.*
- c) Establish project performance benchmarks and updated budget comparisons to measure progress and compliance with critical objectives in mind. Critical stages will be identified and a monitoring checkpoint established to ensure follow up. Communication plan will be developed to match the program's objectives and will include a formal structure for regular reporting, performance milestones, project-wide meetings and policies on information for the community and press.*
- d) Assist the Agency in the preparation of, and then disseminate, policy memoranda related to program requirements and implementation.*

We know that compliance with disaster recovery programs can be extremely complex, and the most valuable commodity is a simple, straightforward solution. Our approach ensures a comprehensive understanding of the issues and potential barriers that can adversely affect Program objectives. As WVDO encounters barriers, we will offer solutions based on our real-world experience. Our subject matter experts (SME) will ensure activities comply with the Stafford Act and all related program regulations, Federal Registers and HUD notices.

Our team has decades of combined experience in the successful planning, administration, and implementation of CDBG and CDBG-DR activities from disaster events across the country. This deep experience provides us with a unique vantage point that bridges the internal public agency, private sector,

and senior-level HUD perspectives. We have extensive experience in CDBG regulatory interpretation, including understanding and maintaining expert-level knowledge of modifications or waivers as provided under applicable Federal Registers. We have provided guidance to States on the types and language of waiver requests that should be submitted to HUD to ensure the CDBG appropriation adequately meets the unique needs of the impacted community.

The complexity of these programs requires concurrent direction, facilitation, and implementation of several large facets of each program's respective activities. In order to provide WVDO with the information necessary to properly manage program activities, the program director will coordinate the efforts of monitoring the compliance with environmental, construction, financial and HUD regulations and then be able to communicate the results timely and effectively. Our proposal includes a team organized with sufficient qualified managers to meet this challenge. HORNE will provide WVDO with everything necessary to navigate all barriers to a successful program conclusion.

Project performance benchmarks and updated budget comparisons will be established to measure progress and compliance with an emphasis on critical objectives. Pivotal stages will be identified and a monitoring checkpoint established to ensure follow-up. HORNE's communication plan will be in line with the program's objectives and will include a formal structure for regular reporting, performance milestones, project-wide meetings, and policies on information for the community and press.

The centerpiece to the oversight of overall program activities is the use of performance and productivity benchmarks for every major activity in each program. These will be consistently monitored and timely reported to appropriate stakeholders. This establishes accountability for deliverables that is so often deemphasized to the detriment of large projects. Budgetary monitoring is also critical for compliance and effective use of funds and will be included in our reviews and reports. This extensive monitoring is an integral part of the overall communication plan that we will establish to ensure that every team member and constituent is informed and aware of pertinent issues and status of the program.

### **34) Reporting**

- a) Provide status reports on a regular basis to keep the Agency informed of a project progress. As requested, meet with the Agency to discuss the status of the project, applicant concerns, and any other issues that may have arisen during the administration of the program. Provide the Agency with project progress reports on demand, as well as access to the project management system, that the project can be monitored. Report information will include project activity deemed critical by the Agency.*

We know that the type of data needed by State leaders' changes over time, and we are prepared to customize our reporting systems to meet the State's desires as needed. HORNE takes a cutting-edge approach to reporting and communication management. Our highly skilled staff represents over 70 years of experience in business process and technology solutions; bringing unrivaled expertise and advanced data-literacy. HORNE is committed to full transparency and will provide real-time visibility through Dashboard reporting as well as on-demand reporting to WVDO.

Timely, accurate and transparent delivery of information is the key to meaningful reporting. Our reporting approach provides relevant, real-time information to all stakeholders for accountability, effective problem solving and decision-making, and adequate forecasting. We will utilize Microsoft SQL Reporting Services to develop a compliance dashboard to track progress with compliance requirements throughout the delivery of the project.



Once the report is deployed and validated, we can set up access based on a subscription schedule. These schedules will send reports via email delivery in some formats, including embedded HTML or as an attachment such as PDF or Microsoft Excel. We will monitor this report on a regular basis to ensure that all issues are identified and addressed promptly.

When an agency is tasked with leading a large disaster recovery effort, it can be challenging to monitor the performance of the myriad of projects that have been awarded. If the WVDO's determines that its current System of Record is inadequate for Program needs, HORNE can develop and deploy a centralized database to track program performance. HORNE would collaborate with program stakeholders to ensure that all relevant information is captured so there is a "one-stop shop" for all data and documentation related to each project. This information can be used to generate reports that provide program activity and performance information needed to make strategic decisions regarding each project such as:

- Project status,
- Budget vs. actual comparisons by project,
- Potential funding de-obligations,
- Construction and closeout timelines,
- Barriers to project completion and action items to address such barriers,
- Monitoring status and any open findings that need to be addressed, and
- Overall program financial information.

*b) In addition to keeping the Agency informed of the progress with each project, compile and review information necessary to prepare reports required under HUD regulations.*

In addition to keeping the WVDO informed of project progress, it's important to be sure reports required under HUD regulations are complete and accurate. We realize DRGR can be a daunting task for governments charged with the administration of CDBG-DR funds. However, if managed proactively, DRGR can become a useful tool to track and promote a program's success, to regulatory bodies and to external stakeholders. HORNE considers minimizing the client's DRGR work and worry to be an integral part of any CDBG-DR effort. We have extensive experience with HUD's DRGR reporting tool. HUD and OneCPD have classified HORNE team members as experts in the area of DRGR knowledge and use. We train and provide technical assistance on all modules within the DRGR system, along with assisting HUD with beta-testing and troubleshooting new changes before releasing to grantees.

We will document, track, and report all information necessary to comply with the various reporting requirements such as progress, beneficiary, Section 3, Labor Standards, etc. on a quarterly, semi-annual, and annual basis. Data to support the program's compliance with HUD's National Objectives, use of Minority/Women-Owned Business, Davis Bacon, and other applicable measures will be tracked and reported as required.

Our knowledge and experience will provide WVDO with the ability to be ready to draw funds from DRGR in a minimal amount of time. Ensuring the activities are entered correctly will provide the best path to accurately reporting and telling HUD your full story. Using our system processes, tools, and reports we have the ability to compile necessary program information into a standardized format in a short amount of time, to respond to any inquiries from HUD.

**35) Closeout**

- a) Ensure that all closeout forms are completed as required. Ensure that 2 CFR 200 compliant procedures are followed with documents and reports maintained and provided in order to satisfy HUD and other federal audit requirements, resulting in an audit-ready financial report of all activities of the grantee and subrecipient, including electronic copies of all supporting documents.*

HORNE is able to provide closeout services based on first-hand experience. If selected by WVDO, HORNE will review every grant or program during its closeout phase to determine what worked well, what could have worked better and what didn't work at all. This "lessons learned" review will consist of personnel interviews, status updates, notes, and other progress reports to determine which processes will be classified as "best practices."

In order to ensure proper closeout, a project/program must be found to be in compliance with all program requirements. HORNE has extensive experience in monitoring programs for CDBG compliance and we will capitalize on that experience when reviewing projects and programs for closeout.

The same care and attention will be used in preparing projects/programs for closeout as was used in preparing for each monitoring visit. As all of the disaster recovery programs are nearing closure, it is important to have all HUD-required information readily accessible. Because we have worked alongside our clients to develop a centralized database to house all relevant data related to each program, the closeout process will be simplified.

HUD's criteria for determining that a CDBG-DR grant is ready for closeout are as follows:

- a. All CDBG-DR funds were spent on eligible activities.
- b. Administrative, Planning and Public Services Costs do not exceed the permitted amounts as provided for in the applicable Federal Register Notices.
- c. Other responsibilities under the grant agreement and applicable laws and regulations have been carried out satisfactorily.

Our approach to ensuring these criteria have been met will be to first look at each program individually. We will review program files to verify the following:

- Policies and procedures have been documented and were followed.
- Information within the file reconciles to DRGR.
- Any monitoring findings or citizen complaints have been resolved.
- Files are consistently and logically organized.
- All documents have been scanned into the System of Record.
- Data in the System of Record is complete and accurate to facilitate reporting of consolidated performance, financial, and beneficiary data.

In addition to the above, we will work with the appropriate WVDO personnel to determine if there are any remaining program funds and whether those funds can be reprogrammed to meet the needs of another existing program. Once each program under a grant is complete and HUD's criteria for closeout readiness have been met, we will work with WVDO program staff to compile and verify the final overall financial, performance, and beneficiary data. Supporting documentation for this final report will be readily available for review by HUD or any other agency responsible for analyzing this information.



HORNE will follow the Grant Closeout Instructions outlined in Community Planning and Development (CPD) Notice 14-02 for CDBG-DR programs and will work directly with the State to determine if and when the program is ready for closeout. We will coordinate program closeout with HUD staff by preparing the required documents to complete the Closeout Checklist and the Grantee Closeout Certification and ensuring that all funds have been drawn down and accounted for and all monitoring and audit findings and citizen complaints are resolved. We will prepare the final performance report and assist the State in submitting it in the DRGR system. We will also support the State in the execution of the grant closeout agreement required by HUD.

### 36) Transition

- a) *It is the intent of the Agency that during this one year Contract, the Contractor will develop and reduce to writing, in consultation with the Agency, a plan to transition the activities covered under this Contract to the Agency to the extent possible. This transition plan should create the processes and procedures required to responsibly transition project management oversight, document control and maintenance; monitoring and regulatory compliance, and eligibility verification to the Agency. During the term of the Contract, the Contractor shall place emphasis on closing out projects and programs in accordance with federal and state guidelines. The Contractor shall provide whatever personnel and resources are required to accomplish the goals set forth for CDBG and CDBG-DR programs.*

HORNE understands that a successful transition plan is critical to meeting WVDO objectives. HORNE will develop and document a comprehensive plan to transition all project administration activities to WVDO. This (transition) plan will consider traditional deliverables such as program files and records, database management, and similar but will also materialize the intangible to tangible by reducing our years of direct involvement and institutional knowledge to writing to ensure WVDO has the necessary information and resources to finish strong.

# ATTACHMENT A:

## PRICING

*Total cost per hour, per position and the estimated hours needed for the engagement. This cost should include all overhead expenses including any related travel. All other fees and costs associated with the project should be included. Pricing must adhere to Government Service Administration (GSA) regulations and requirements. The Agency is requesting proposals for a firm fixed price contract for services.*

At HORNE, we believe that professionals should be able to tell you what it costs to do a job. At this point, you likely have not sorted out all the project details and we understand that your needs will evolve. Our years of experience performing similar services ensure that we know what to expect.

This experience allows HORNE to offer you a true turnkey price that includes all services defined in our response which exceed the requested services defined in the WVDO's request for proposal. We can offer this price because we have delivered the same services to clients all over the country time after time. Now, we are excited to do the same for West Virginia and its citizens.

Our rate per position for all activities requested in the RFP are as follows:

POSITION	HOURLY RATE	POSITION	HOURLY RATE
Project Partner	\$0	Construction Manager	\$175
Project Director	\$265	Project Architect	\$160
Subject Matter Expert	\$235	Project Engineer I	\$200
Project Manager I	\$215	Project Engineer II	\$170
Project Manager II	\$205	Project Engineer III	\$140
Project Coordinator I	\$175	Project Geographer I	\$175
Project Coordinator II	\$165	Project Geographer II	\$130
Project Coordinator III	\$150	Project Inspector I	\$140
Project Analyst I	\$135	Project Inspector II	\$120
Project Analyst II	\$115	Project Surveyor I	\$160
Project Analyst III	\$95	Project Surveyor II	\$120
Administrative Technician	\$50	Project Technician	\$105

Based on the services requested, we have proposed a 3-phased approach to guide the WVDO's vision from inception through closeout of the CDBG-DR grant. These phases are inter-dependent and may occur simultaneously depending on the ultimate execution of the WVDO's vision for recovery.



We estimate a total of up to 16,100 hours are needed for all 3 phases of this engagement. However, we aren't compensated for our estimated effort, rather we are compensated based on the delivery of the services described in our response. No gimmicks or small print. Our commitment to the West Virginia Development Office is to provide all services requested in the RFP as responded to in this document for a firm-fixed price as requested in the RFP. Our firm-fixed price and summary of deliverables for each phase follows.

### PHASE 1 – ACTION PLAN

Summary of Project Management Services Phase 1	Required by RFP	Included in Firm-Fixed Price Guarantee
Under the direction of the WVDO, HORNE will prepare and submit a comprehensive CDBG-DR Action Plan according to the requirements outlined in the HUD Federal Register Notice describing the needs, strategies, and projected uses of the Disaster Recovery funds. This plan will also determine and guide how any additional CDBG-DR funding related to the current disaster would be utilized.	Yes	Yes
Set-up the WVDO's electronic Action Plan in DRGR. Provide comprehensive DRGR training and technical assistance to WVDO staff members.	No	Yes
Firm-Fixed Price Guarantee (for Phase 1 Services)		\$150,000

### PHASE 2 – PROGRAM GUIDANCE, DESIGN AND DEVELOPMENT

Project Management Services Phase 2	Required by RFP	Included in Firm-Fixed Price Guarantee
Ensure program and grantee adherence to U.S. Department of Housing and Urban Development (HUD) Regulations and Program Requirements.	Yes	Yes
Program Development and Support	Yes	Yes
Policy Development and Review	Yes	Yes
Develop comprehensive training, communication, monitoring, and reporting plans.	Yes	Yes
Perform assessment of prospective subrecipients. Develop policies, procedures, and templates necessary to effectively manage the subrecipients ultimately associated with the various recovery programs. Prepare training materials for subrecipients.	Yes	Yes
Assess WVDO's current information system and provide recommendations based on findings.	Yes	Yes
Perform change control as program evolves.	Yes	Yes
Train Agency staff members and other relevant stakeholders.	Yes	Yes
Technical assistance around Section 3, Fair Housing and Minority and Women Owned Business Enterprise (MWBE) reporting and compliance for CDBG.	No	Yes
Technical assistance to the WVDO regarding CDBG, CDBG-DR, CDBG-NDR, and Public Laws 113-2 & 114-113 regulations and best practices.	No	Yes
Technical assistance on waiver requests and policy liaison for HUD funding streams.	No	Yes
Technical assistance with planning, managing, and compliance requirements associated with various HUD-administered programs such as Housing Rehabilitation and Reconstruction, Housing Appraisal, Rental, Infrastructure, Economic Development, and Small Business.	No	Yes
FEMA project worksheet development	No	Yes
Development of Tier 1 Environmental Categorical exclusion parameters	No	Yes
Staff augmentation, as desired	No	Yes
Firm-Fixed Price Guarantee (for Phase 2 Services)		\$675,000

### PHASE 3 – PROGRAM IMPLEMENTATION

The WVDO's complete vision for recovery has yet to be defined. The type and scope of recovery projects, as well as ultimate amount of funding, directly affect the cost to implement them. Currently, the WVDO has been awarded \$17,000,000. For this tranche of funding, our fixed-fee price would be \$2,150,000 for the services associated with Phase 3 Services. This price would cover implementation of substantially any type of program desired by the WVDO – housing programs, infrastructure and/or economic revitalization programs.

This fixed-fee price for all services represent 17.5% of the awarded funding. Generally, as awarded funding increases, our price decreases based on our ability to scale and the fact that administrative services would not be duplicated. The table below provides an example of our price based on awarded funding:

FUNDS AWARDED	PRICE
\$0 - \$100,000,000	17.5% of funding
\$100,000,000 - \$300,000,000	15.0% of funding
\$300,000,000 and up	12.5% of funding

Another major factor when considering price is the type of program to be implemented. For example, the implementation of an infrastructure program could be as low as 4% of the awarded funding. It is likely that the WVDO will ultimately decide on a mix of recovery programs. Once the WVDO has established a framework for their recovery programs, HORNE will provide comprehensive pricing package to deliver full implementation for those programs.

Program implementation includes services such as:

- Execution of the approved comprehensive training, communication, monitoring, and reporting plans. (RFP #6, #23, #29)
- Perform outreach and intake (RFP #30)
- Perform programmatic and contractual oversight and monitoring (RFP #8, #33)
- Monitor subrecipient compliance with federal and state regulations as well as program guidelines (RFP #7, #10, #19, #26)
- Perform or assist in oversight of the distribution of funds including documentation compliance (RFP #11)
- Document Control and Management (RFP #11, #12)
- Support of Program Operations, as required (RFP #20)
- Program Management Team Support (RFP #21)
- IT Oversight and System Development (RFP #22)
- Perform change control (RFP #24)
- Environmental Review Process (RFP #25)
- Engineering and Construction Management (RFP #27, #31)
- Track, communicate, and assess performance benchmarks (RFP #28)
- Eligibility verification (RFP #30)
- Property Management operations (RFP #32)
- Reporting and Communication (RFP #16, #17, #18, #34)



- Closeout (RFP #35)
- Transition (RFP #36)
- Staff augmentation, as desired

At HORNE, we want our clients to only pay for results. Too many times, entities hire contractors that show up with low rates and big promises only to get hit with one change order after another. We offer pricing options that transfer the risk of completion to us.

For example, for a single-family housing rehabilitation program, we have developed the following unit pricing for the most common implementation services:

SINGLE-FAMILY REHABILITATION UNIT SERVICE	UNIT PRICE PER APPLICANT
Outreach, Intake, and Eligibility Processing	\$800
Eligibility QC and DOB Verification	\$180
Ownership Legal Aid/Title Remedy	\$200
Application Escalation & Appeals Team	\$100
Builder Oversight	\$925
Topographical Survey(s)	\$1,150
Elevation Certification Process	\$500
Foundation Design	\$825
Windstorm Engineering & Inspection	\$950
Builder Oversight	\$925
Damage, Scope, & DOB Assessments	\$1,500
Final Construction Inspections	\$550
Environmental Review	\$1,500
Lead Based Paint Assessment	\$1,600
Compliance Monitoring, Internal Audit, & File Closeout	\$100

We want effort (i.e., our hourly rates and estimated time to get it done) to be completely irrelevant to you. We want you to pay a fair price for only the deliverables you desire. The HUD PHA Handbook, Chapter 10, page 8 says that, “in accordance with 24 CFR 85.36(b)(10), a time-and-materials contract may be used only when the Contracting Officer has determined that no other type of contract is suitable...”. Our goal is to provide you with options that reduce your risk through deliverable-based mechanisms that are best-in-practice for disaster recovery programs.

## APPENDIX A: KEY PERSONNEL RESUMES





**FIRM**

HORNE LLP  
November 2007 – Present

**AREAS OF EXPERTISE**

- HUD
- CDBG
- National Disaster Resilience Competition
- Disaster Recovery
- HOME Investment Partnerships Program
- Tax Credit
- Public Housing Finance

**YEARS OF EXPERIENCE**

- 25 years

**EDUCATION**

- BS, Finance and Economics, Florida State University

**RELATED EXPERIENCE**

Scott joined HORNE in 2007 and is a partner in HORNE's government services division. He facilitates planning and coordination of HORNE's disaster recovery programs. Scott works with state and local governments to solve funding issues associated with disaster recovery and helps identify disaster recovery program improvements to assist States in streamlining their operations and increase organization effectiveness.

Scott is a senior policy advisor with more than 25 years of experience at all levels of government, capabilities and expertise in a wide variety of business sectors, but maintains a strong focus in the federal appropriations process, the programs of the U.S. Department of Housing and Urban Development, the financial services sector, health care and public/private housing initiatives.

*Director of Housing Programs, HORNE, Texas General Land Office (GLO), August 2013 - Present*

Scott currently oversees HORNE's CDBG-DR programs across the State of Texas. His responsibilities include program oversight and client management services for \$400 Million in CDBG-DR housing funds. Scott directs program activities for Galveston County, City of Galveston, City of Houston, Lower Rio Grande Valley, and Southeast Texas. His responsibilities include client management, budget oversight, reporting oversight, and overall program compliance assurance. Scott works with the Texas General Land Office leadership to ensure that benchmarks and milestones established are achieved on time and are in full compliance with the GLO program guidelines and HUD rules and regulations.

*Deputy Chief of Staff, United States Department of Housing and Urban Development, Washington, D. C., 2003 - 2007*

While at the Department of Housing and Urban Development (HUD), Scott directed personnel, political, and policy matters for over 9,000 employees in Washington, D.C. and across the country. He served as the senior political and policy advisor to the Secretary on all Departmental, Congressional, Cabinet and executive agency issues. Scott was responsible for overseeing and negotiating the agency's budget requests from FY2004 through FY2008 with both the Executive Office of the President and the Congress. Further, he was tasked by the Secretary to work with the President's senior staff to manage and coordinate the Department's programmatic and operational efforts to accomplish the President's goals and initiatives. Scott was instrumental in managing the Department's response during and after the 2004 Gulf Coast hurricanes as well as Gulf Coast recovery following Hurricane Katrina. Those efforts included the development of an allocation process to distribute almost \$18 Billion in Community Development Block Grant (CDBG) funds to Texas, Louisiana, Mississippi, Alabama, and Florida, working with the Governors of those states to develop creative solutions for use in recovery, the redevelopment of public housing at the Housing Authority of New Orleans, and the rebuilding of Charity Hospital and other public infrastructure programs. In 2006, President Bush nominated Scott for the position of Assistant Secretary for Congressional and Intergovernmental Relations.

*Director of Governmental Affairs, Greenberg Traurig Law Firm, Tallahassee, Florida, 1994 - 2003*

Scott spent ten years at the Greenberg Traurig Law Firm in Tallahassee, Florida, as Director of Governmental Affairs. He represented a wide variety of interests, including the Habitat Companies and the Chicago Housing Authority, but specialized in public housing authority policy realignment, health policy advocacy, utility regulation, and property and casualty insurance regulation.

**FIRM**

HORNE LLP  
July 2005 – Present

**AREAS OF EXPERTISE**

- HUD CDBG Disaster Recovery
- Internal Auditing
- Stafford Act Compliance
- Compliance and Monitoring
- Duplication of Benefits
- Regulatory and Programmatic Analysis

**YEARS OF EXPERIENCE**

- 7 Years

**EDUCATION**

- Bachelor of Accountancy, University of Mississippi
- Master of Accountancy, University of Mississippi

**CERTIFICATIONS**

- Certified Internal Auditor
- Project Management Professional
- Certified Fraud Examiner

**PROFESSIONAL AFFILIATIONS**

- Institute of Internal Auditors
- Project Management Institute
- Association of Certified Fraud Examiners

Trey joined HORNE in 2005 and is a senior manager within the Government Services practice group. Currently, he serves as the Director of Mississippi CDBG services for the Mississippi Development Authority. He specializes in delivering comprehensive strategies to clients as they administer disaster recovery programs by assisting them in all phases of recovery including planning, implementation, execution, and closeout. Trey assists clients in meeting contractual and program requirements. He develops, implements, and monitors compliance programs to ensure activities administered by grant guidelines as well as all applicable state and federal regulations.

**PROJECT SPECIFIC EXPERIENCE**

*Mississippi Development Authority (MDA), Jackson, MS, November 2009 to Present*

*Program Management Office (PMO), March 2013 – Present*

Trey serves as program director of the PMO providing comprehensive program management, compliance, monitoring, and financial guidance. The PMO encompasses approximately \$5.4 billion of CDBG funding over 18 eligible programs. These programs include single and multi-family housing, rental, rehabilitation, new construction, homeowner assistance, elevation, public housing, economic development, and community revitalization. He works closely with the MDA's Disaster Recovery Division to create transparency, accountability, and consistency across projects. He provides expertise regarding compliance with government regulations, financial management, and accurate federal reporting. Trey directly coordinates all compliance and oversight activities.

*Neighborhood Home Program (NHP), March 2013 to Present*

Trey provides program management, policy implementation, project development, and financial guidance for the state's \$182 million single-family home repair and reconstruction program.

*Long-term Workforce Housing Program (LTWH), January 2010 to March 2013*

Trey was responsible for oversight and compliance of the LTWH Program, a \$350 million CDBG-DR program designed to provide affordable housing to low to moderate income families displaced due to Hurricane Katrina. The LTWH Program provided single family and multi-family rehabilitation and new construction, down payment assistance, and mortgage assistance for applicants that could not meet traditional lending criteria.

*Port of Gulfport Restoration Program (PGRP), November 2009 to January 2010*

Trey was responsible for monitoring and compliance on the PGRP Program, a \$577 million CDBG-DR program designed to provide funding to the Mississippi State Port Authority to facilitate the restoration of the port's infrastructure and facilities.





*Be It Known That*

**Irvin Leon Breckenridge, III**

Has successfully met the prescribed requirements  
for certification as established by The Institute of Internal Auditors  
and is hereby awarded the professional designation of

**Certified Internal Auditor**

during its 40<sup>th</sup> anniversary year  
Conferred by the Professional Certification Board and the Board of Directors  
of The Institute of Internal Auditors

This month of  
**January 2014**

*Paul J. Abel*

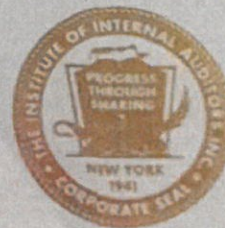
CHAIRMAN OF THE BOARD OF DIRECTORS

*Stephen O. Hogfest*

CHAIRMAN OF THE PROFESSIONAL  
CERTIFICATION BOARD

**125746**

CERTIFICATE NO.









# University of Mississippi



To the Friends of learning everywhere, Greetings  
Be it known that

**Irvin Leon Breckenridge III**

having completed the required course of study, is this day, by action of the  
Faculty and of the Board of Trustees, declared a

**Bachelor of Accountancy**

of the University of Mississippi and is admitted to all rights and privileges  
belonging to this degree.

In testimony whereof is awarded this diploma duly certified by the signatures  
of the proper officers, and the seal of the University, affixed this the  
twenty-second day of December in the year of our Lord 1998 and in the 151st  
year of the University.

FOR THE TRUSTEES

*Cassie Romington*

President



FOR THE FACULTY

*Robert C. Krayat*

Chancellor

*James W. Davis*

Dean



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fifth day of August in the year of our Lord 2000 and in the 152nd year of the  
University.

FOR THE TRUSTEES

President



FOR THE FACULTY

Chancellor

Dean

**FIRM**

HORNE LLP

October 2015 – Present

**AREAS OF EXPERTISE**

- Fair Housing Compliance
- Community Development Block Grants-Disaster Recovery
- Government Relations
- Disaster Recovery Services
- Contracts, Corporate
- Banking, Commercial Transactions

**YEARS OF EXPERIENCE**

- 12

**EDUCATION**

- JD, University of Mississippi School of Law
- BS, Marketing, Mississippi College

**REGISTRATION/CERTIFICATION**

- Admitted to the Mississippi Bar
- United States 5th Circuit Court of Appeals

Anna is a senior manager in government services at HORNE LLP where she serves as a compliance expert supporting disaster recovery contracts to ensure compliance with all federal and state regulations. She has an advanced understanding of the regulatory requirements and program rules for disaster assistance programs authorized by the Robert T. Stafford Act. Anna joined the firm in 2015 with more than ten years of legal experience in the areas of commercial transactions, government relations, community development block grant compliance, federal and state regulatory compliance, corporate law, and government contracts.

**PROJECT SPECIFIC EXPERIENCE***Counsel, HORNE, October 2015 – Present*

Anna's practice includes consultation with communities regarding the new Affirmatively Furthering Fair Housing rule finalized by HUD in 2015 and the additional guidance, tools and program requirements stemming from the implementation of the new AFFH rule. Anna is a recognized expert in the field of Section 3 compliance and specializes in the custom development and implementation of Section 3 programs for recipients of CDBG funds. She has an advanced understanding of the regulatory requirements and program rules covering disaster assistance programs authorized by the Robert T. Stafford Act and is frequently requested to serve as a guest speaker for jurisdictions participating in the CDBG and CDBG-DR programs regarding the best ways to marry the compliance requirements with the program purposes and objectives. Recognized in the field of CDBG as a Section 3 expert, Anna is passionate about helping communities implement the program requirements, not only to ensure compliance but to facilitate through compliance the growth and possibility available under the federal programs.

*Watkins & Eager PLLC, Counsel, May 2005 – July 2008; December 2010 – October 2015*

Anna served as a senior legal counsel for Mississippi's Hurricane Katrina CDBG-DR housing, infrastructure and economic development programs. While in this role, Anna advised the executive branch of the state government along with the administering state agencies on all issues relating to CDBG-DR policy development and implementation. In addition to her role as counselor, she served in the important role of oversight counsel for multiple CDBG-DR programs ensuring compliance in critical areas including procurement, fair housing, Section 3, labor standards and national objective compliance.